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16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ORANGE COUNTY
19 COASTKEEPER, a California non-
20 profit corporation,

21 Plaintiff,

22 v.

23 CERTIFIED AUTO SALVAGE;
24 RON STEVENS; JUDY WISLOCKI,
25 Defendants.

Case No. 8:22-cv-02044-FWS-JDE

**REQUEST FOR ENTRY OF
CONSENT DECREE**

Honorable Fred W. Slaughter

26 On April 3, 2023, Plaintiff Orange County Coastkeeper sent a letter to the
27 United States Department of Justice and the United States Environmental Protection
28 Agency to trigger a mandatory 45-day review period to review the [Proposed]

1 Consent Decree entered into by the parties on March 30, 2023. *See* 33 U.S.C. §
2 1365(c); 40 C.F.R. § 135.5. On May 4, 2023, the Department of Justice sent the
3 parties a letter indicating that the federal agencies had no objection to entry of the
4 [Proposed] Consent Decree. That letter is attached hereto as Exhibit 1. Accordingly,
5 the Parties hereby respectfully request that the Court enter the [Proposed] Consent
6 Decree filed with the Court contemporaneously with this request.

7
8 Respectfully submitted,

9
10 Dated: May 8, 2023

LOZEAU DRURY LLP

11
12 /s/ Douglas J. Chermak

13 Douglas J. Chermak

14 *Attorneys for Plaintiff* ORANGE COUNTY
COASTKEEPER

15
16 Dated: May 8, 2023

GHASSEMIAN LAW GROUP, APC

17
18 /s/ Elaine Alston

(as authorized on 5/8/23)

19 Elaine Alston

20 *Attorneys for Defendant* CERTIFIED AUTO
21 SALVAGE

22
23 Dated: May 8, 2023

ENVIRONMENTAL LAW GROUP LLP

24 /s/ Josh Rosenbaum

25 (as authorized on 5/8/23)

26 Josh Rosenbaum

27 *Attorneys for Defendants* RON STEVENS and
28 JUDY WISLOCKI

